

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA.

ORDER GRANTING THREE HUNDRED EIGHTY-SIXTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF PUERTO RICO ELECTRIC POWER AUTHORITY TO CLAIMS ASSERTED AGAINST THE INCORRECT DEBTOR

Upon the *Three Hundred Eighty-Sixth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Claims Asserted Against the Incorrect Debtor* [ECF No. 17928] (the “Three Hundred Eighty-Sixth Omnibus Objection”),² filed by the Puerto Rico Electric Power Authority (“PREPA”), dated August 20, 2021, for entry of an order reclassifying certain claims

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Two Hundred Eighty-Sixth Omnibus Objection.

filed against PREPA, as more fully set forth in the Three Hundred Eighty-Sixth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Eighty-Sixth Omnibus Objection and to grant the relief requested therein pursuant to Section 306(a) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)³; and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Three Hundred Eighty-Sixth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Asserted” in Exhibit A to the Three Hundred Eighty-Sixth Omnibus Objection having improperly identified PREPA as obligor, when such claims are properly asserted, if at all, against the debtor(s) identified in the column titled “Corrected” in Exhibit A to the Three Hundred Eighty-Sixth Omnibus Objection; and the Court having determined that the relief sought in the Three Hundred Eighty-Sixth Omnibus Objection is in the best interest of PREPA, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Eighty-Sixth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Eighty-Sixth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the claims identified in the column titled “Asserted” in Exhibit A to the Three Hundred Eighty-Sixth Omnibus Objection are hereby reclassified to be claims asserted against the Title III debtor(s) indicated in the column titled “Correct” in Exhibit A; and it is further

³ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

ORDERED that the Debtors' right to object to the Reclassified Claims is reserved;
and it is further

ORDERED that Prime Clerk is authorized and directed, in the official claims register in the PROMESA cases, to move the claims identified in the column titled "Asserted" in Exhibit A to the Three Hundred Eighty-Sixth Omnibus Objection from PREPA's Title III Case (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) to the Title III case for the debtor(s) identified in the column titled "Corrected" in Exhibit A to the Three Hundred Eighty-Sixth Omnibus Objection; and it is further

ORDERED that this Order resolves Docket Entry No. 17928 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Eighty-Sixth Omnibus Objection

THREE HUNDRED EIGHTY-SIXTH OMNIBUS OBJECTION

Exhibit A – Incorrect Debtor

NAME	CLAIM #	ASSERTED		CORRECTED	
		DEBTOR	CLAIM AMOUNT	DEBTOR	CLAIM AMOUNT
1 ACEVEDO PEREZ, JANNETTE URB MIRADOR DE CUPEY E 4 CALLE 4 SAN JUAN, PR 00926	63171	PUERTO RICO ELECTRIC POWER AUTHORITY	\$7,260.00	COMMONWEALTH OF PUERTO RICO	\$7,260.00
Reason: Claimant identifies as obligor the Puerto Rico Electric Power Authority, when the proof of claim shows that any liability would reside, if at all, under the Commonwealth of Puerto Rico					
2 CANALS VIDAL, MARCOS F PO BOX 360097 SAN JUAN, PR 00936-0097	16883	PUERTO RICO ELECTRIC POWER AUTHORITY	\$9,079.00	COMMONWEALTH OF PUERTO RICO	\$9,079.00
Reason: Claimant identifies as obligor the Puerto Rico Electric Power Authority, when the proof of claim shows that any liability would reside, if at all, under the Commonwealth of Puerto Rico					
3 ETHICON LLC MCCONNELL VALDES LLC C/O NAYUAN ZOUAIRABANI PO BOX 364225 SAN JUAN, PR 00936	5797	PUERTO RICO ELECTRIC POWER AUTHORITY	\$439,478.83	COMMONWEALTH OF PUERTO RICO	\$439,478.83
Reason: Claimant identifies as obligor the Puerto Rico Electric Power Authority, when the proof of claim shows that any liability would reside, if at all, under the Commonwealth of Puerto Rico					
4 FRAU ESCUDERO, JUAN ANTONIO MONIQUE J.M. DIAZ-MAYORAL P.O. BOX 364174 SAN JUAN, PR 00936-4174	75580	PUERTO RICO ELECTRIC POWER AUTHORITY	\$24,547.48	COMMONWEALTH OF PUERTO RICO	\$24,547.48
Reason: Claimant identifies as obligor the Puerto Rico Electric Power Authority, when the proof of claim shows that any liability would reside, if at all, under the Commonwealth of Puerto Rico					

* - Indicates claim contains unliquidated and/or undetermined amounts.